

Farnham Town Council Response

Waverley Borough Council Local Plan Issues and Options Consultation

8 December 2025

Settlement Hierarchy

Q1 What are your thoughts on the current settlement hierarchy? We would be interested to know if you think it's still accurate or do any of the settlements need to move into different categories? If so, please explain your reasoning.

The 2012 Settlement Hierarchy (Factual Update) requires updating (both in methodology and content) if it is to serve its role in the evidence base for the local plan. However, this process is more likely to identify any changes in the status of smaller villages than in the relative position of larger settlements and there is no doubt that Farnham, along with Cranleigh, Godalming and Haslemere, will remain as the 'top tier' settlements in the hierarchy. Farnham is more complex than Cranleigh, Godalming or Haslemere because it incorporates a number of villages (Badshot Lea, Hale, Heath End, The Bourne, Rowledge, Runfold, Weybourne, Wrecclesham) and distinctive areas which have their own independent character and this needs to be understood in the revised settlement hierarchy.

It should be recognised within the local plan process that a hierarchy is just that – an ordering of settlements based on certain criteria. It should not be assumed that it also provides a simplistic answer to questions about the relative capacity for development in a particular settlement.

Q2 Are there any specific settlements that need more services and facilities and if so, please could you let us know which settlements they are and the services and facilities you feel are currently lacking?

In Farnham Farnham Town Council's principal concern is with the scale and accessibility of services and facilities rather than whether they exist at all. Our residents have access to a range of services they can reasonably expect, but that does not mean that they are adequately provided for at present. Where services are already experienced as inadequate by the resident population it is not surprising that there is resistance to further development unless there is a high degree of certainty that this will not make matters worse. The scale and accessibility of services and facilities is therefore important and a joined-up approach between WBC and infrastructure providers, in particular the Integrated Care Board, Surrey County Council, South East Water and Thames Water is essential.

Q3 We would be interested to know what you see the role of your town/village/hamlet is in 2043? Will it be different to its current role or would you like to see it change? Please could you explain your reasoning.

Farnham Town Council sees the role of Farnham within the Surrey/Blackwater Valley area remaining similar that which it is today. It will retain a distinct identity as a cultural and creative industries hub, perhaps with additional emphasis on employment opportunities within those

sectors. It should not be allowed to coalesce with other settlements in the Blackwater Valley. Its transport connections should be continuously upgraded to ensure that it remains attractive as a residential area and can sustain any growth without detrimental impacts on quality of life.

The village areas mentioned in our reply to Question 1 must retain their local character and not be allowed to blend to the extent that this is altogether lost.

How Can We Plan for Growth?

Q4 Are there any pros and cons we have missed from any of the approaches outlined above?

The analysis of the pros and cons of each approach is fair. In relation to Approach 3, Farnham Town Council would emphasise the risk that growth around Farnham (or other towns for that matter) leads to the growth of dormitory suburbs which are essentially ‘anywhere places’ and which neither contribute to or benefit from the character of Farnham. There is a limit to which peripheral growth can occur before it becomes ‘detached’ from its supposed host settlement. Such growth may also be dependent on major infrastructure investment, such as additions to the strategic road network, if they are to represent a sustainable form of development.

Any approach or combination of approaches should be in the context of housing need figure which allows for sustainable development rather than ‘development at any cost’. Farnham Town Council support the steps being taken by Waverley (specifically the points raised in the motion agreed at the full council meeting on 2 December 2025) to challenge the government’s assumptions in that regard.

WBC Infrastructure Delivery Plan (IDP) must be updated to include the infrastructure required to support growth in Waverley: [Infrastructure Delivery Schedule Update October 2024](#)

Q5 What are your views on each of the approaches listed above – what do you think are the pros and cons of each approach in your area?

As defined urban area Farnham has some, as yet unidentified, urban capacity. Intensification and better use of underused sites is almost certainly possible, but the contribution it will make to the overall housing need is likely to be small. Farnham Town council is strongly opposed to intensification which has a harmful effect on the residential character of any part of Farnham or any of its heritage assets, green spaces or still relevant employment opportunities.

The reuse of brownfield sites should always be a policy preference but as we have seen with the Woolmead site in central Farnham, it is often critically sensitive to viability issues and slow to deliver even after planning consent has been obtained. Placing over-reliance on the relatively small number of available brownfield sites could have the unintended outcome of encouraging poor quality proposals just to meet viability requirements.

Growth on the periphery of the town, extending out into green field areas, may be an acceptable option if those areas can still be properly connected into the transport and infrastructure network of the town, rather than being isolated from it. Farnham Town Council sees that as the major challenge. However such growth must not be allowed to lead to a loss of the town’s identity or coalescence of character areas or with neighbouring settlements to create

urban sprawl. That has been an underlying principle of planning policy in the area for many years and should remain so.

The creation of a new settlement to accommodate a significant quantity of housing need in a single sustainable location should be considered seriously. There are good examples of this having been achieved in other parts of the country and the bad experience of Dunsfold should not impact consideration of this as an option. The key will be to work with landowners/developers to ensure that a genuinely viable and deliverable package can be put forward.

Q6 Of the approaches listed above, what is your preferred option for accommodating growth in Waverley?

Farnham Town Council does not have a preferred option – as we have said they will all require proper consideration through the local plan process and some element of at least four of them is likely to be needed if WBC is to come close to meeting its housing need. The option of a new settlement must be included in that evaluation.

It may be that the only ‘real’ choice facing WBC is what role (if any) a new settlement might play in providing for a significant part of the total housing need and using the other approaches to address the remainder.

Q7 Are there any other approaches that you think the Council should consider that are not listed above? If so, please describe them.

Not at this time.

Q8 Do you have any further comments on the issues and options raised in Chapter 3?

Farnham Town Council urges WBC to take an infrastructure capacity and sustainability led approach to its evaluation of the options. Too often we see attempts to ‘bolt on’ infrastructure or sustainability capacity (for instance measures to promote active transport) to development which is simply in the wrong location for it to work properly. That would certainly be a risk for expansion beyond Farnham’s existing urban area. One test for the appropriate location of development should always be how little would need to be done or spent to ensure that it is a good place to live.

Full account should be taken of work already completed, in particular the Farnham Optimised Infrastructure Plan October 2021, to identify infrastructure works required to both improve existing conditions and, by extension, to enable additional sustainable development to take place.

Protecting and Enhancing the Environment

Q9 What do you think the Council’s approach should be to ensuring that people avoid harming the environmentally sensitive parts of the borough?

Farnham Town council would always expect local plan policies to ensure that development – large and small – is directed towards those parts of the borough where any environmental harm

will be as low as possible. Development management policies should ensure that environmental harm is minimised.

The local plan is required to 'have regard' to the aims and objectives of the Surrey Local Nature Recovery Strategy. This should form an integral and determinative element in assessing the strategic options and preferred location for development.

Q10 Are there current Green Belt sites that you feel have the potential for more positive uses?

Farnham Town Council has not identified sites suitable for development within the small part of Farnham's administrative boundary which falls into the Green Belt. The Green Belt Assessment that will inform the local plan will identify any 'grey belt' sites that WBC may consider it appropriate to allow for development elsewhere in the borough. It would be sensible to release those sites which meet the 'grey belt' definition before removing other land from the Green Belt.

Q11 Do you think there are opportunities for limited development within the National Landscape?

The National Landscape is not a suitable location for major development. Minor or 'medium sized' (if that definition is introduced by the government) development in the National Landscape should be allowed in circumstances where this would meet an important local need, but subject to carefully worded policy that will ensure it is of the highest quality and enhances the character of the area.

Q12 Do you think the South Farnham Arcadian Areas, Haslemere Hillside and Godalming Hillsides should be retained as is?

Farnham Town Council strongly support retaining the identification of the South Farnham Arcadian Area as a planning designation and agree that its inclusion in the local plan (as well as our Neighbourhood Plan) would provide a useful level of protection and continuity.

Q13 Do you think the land within the ASVI and/or AGLV should be retained or adjusted in any way? Which areas would this affect?

Although these are not a statutory designations, Farnham Town Council supports the retention of ASVI and AGLV within the local plan. AGLV needs to be adjusted where recent appeals have been allowed in Farnham. Farnham ASVI should be retained and more weight given to ASVI in place to protect against pressure of edge of settlement development where the visual impact would be harmful.

Q14 Do you think the land within the Farnham Strategic Gap should be retained or adjusted in any way? Which areas would this affect?

Farnham Town Council strongly supports the retention of the Farnham Strategic Gap. No land should be removed from the area currently identified. We would like the policies within the local plan that help to retain the identity of Farnham and prevent coalescence to be

strengthened in the next local plan and for this to be a key consideration in making site allocations (i.e. there should be no allocations which reduce the physical or visual effect of the strategic gap).

Q15 Are there any other local landscape designations that should be considered for retention?

Obviously any statutory designations should be taken properly into account when options are being considered. It may well be that they are of such significance that they constrain one or other of those options in a particular area.

Q16 How can green space within the borough be more accessible? If so, how can the policies in the local plan help achieve this? Should we include minimum standards for the amount or type of green space that is needed?

The Farnham Neighbourhood Plan identifies and protects local green spaces. Farnham Town Council strongly supports the inclusion within the local plan of policies that would enhance their protection on a borough wide basis. In terms of accessibility to green spaces it is also important that the location of new development proposals take full account of existing networks and the means of reaching them via public rights of way. We urge WBC to give careful consideration to accessibility as well as amount as an issue affecting public benefit from green spaces.

We are not sure that minimum standards are the best way for policy to operate. It might be more appropriate for policy to require that 'sufficient and suitable' green space is provided or readily accessible and for this to be evaluated as part of individual proposals.

Q17 How important is the environment in Waverley to you? What parts of the environment are most important to you and where are they located? Please name the parts and locations.

Of course, Farnham's local environment and that of Waverley, Surrey and the region as a whole is of great value to us and our residents. The Farnham Neighbourhood Plan identifies Biodiversity Opportunity Areas. Of concern to us are those parts of our environment with historic connections which have played a role in defining the way in which Farnham has grown. These must receive high levels of protection from development that will have an adverse effect on their integrity or setting.

Q18 How can the new local plan achieve benefits for the environment?

The local plan must consider the requirements for environmental mitigation, in particular the provision of SANGs and land for local (but off site) BNG provision. Without such provision there will be constraints particularly on brownfield development which are dependent on that provision. A careful choice of sites can result in multiple benefits providing accessible recreation, habitat regeneration and facilitating development that would otherwise require green field land.

As previously mentioned, the local plan must have regard to the content of the Surrey Local Nature Recovery Strategy. As well as influencing the choice of strategic options, we suggest that there should be a specific policy which requires that the effect of development on the achievement of outcomes identified by the Local Nature Recovery Strategy be fully assessed.

Q19 Are there any particular existing natural or semi-natural areas that you think could be linked to form a network of green and/or blue infrastructure? If so, please could you provide details of these areas and the reasons why you think they should form part of a network?

The Farnham Neighbourhood Plan identifies Biodiversity Opportunity Areas. Farnham Town Council endorses the comments made in the submission by the Farnham Biodiversity Partnership, particularly regarding the importance of maintaining connectivity between elements of the biodiversity rich river corridors, woodland and chalk grassland areas around the town. Particular care and protection must be given to Farnham Park and Farnham Old Park and their historic links into the east Hampshire landscape.

Q20 Are there any particular landscape designations in addition to the national landscape designations that should be protected? If so, please provide details and your rationale.

The Surrey Hills National Landscape is to be extended in Farnham. Nature conservation designations appear more widely than landscape designations in Farnham from EU to local designations: SPA, SSSI, SNCI, LNR, ASNW.

Q21 Should we look to provide Biodiversity Net Gain targets above the mandated 10%?

Whilst Farnham Town Council supports the aim of mitigating any harm to biodiversity from development and doing everything we can to restore habitat. However there would be little point in raising the BNG target unless we can sure that this will be achieved to local benefit. If higher BNG targets can only be met by off site measures which may not even be in the Waverley area then any benefit would be very limited (at least to our environment). We would suggest prioritising the biodiversity mitigation hierarchy (and the BNG hierarchy) to reduce the amount of harm caused in the first place, and for policy to require that mitigation measures which are needed should take place locally where possible.

Q22 How can the new local plan measure the impacts on biodiversity?

As WBC will be well aware there are no widely accepted mechanisms or metrics for measuring the positive impact of planning decisions on biodiversity, and we have no specific suggestions to make. However, it is essential that in order to assess change over time WBC has a comprehensive baseline study and takes account of the evidence base for the Local Nature Recovery Strategy.

Q23 Do you have any further comments on the issues and options raised in Chapter 4?

The whole point of identifying 'irreplaceable' habitat is that its loss cannot be mitigated or compensated for. The policies in the local plan should be drafted on the basis that irreplaceable habitat can only be lost where development is overwhelmingly necessary in the public interest and all reasonable alternatives found to have worse impact.

Q24 What should our approach be in relation to the historic environment and how should we ensure that we secure the sustainable long term use of our heritage assets?

Local plan policies should support identifying and securing the optimal viable use for built heritage assets. A degree of flexibility and pragmatism is appropriate particularly where there is the opportunity to secure long term investment in circumstances where the alternative is for heritage assets to suffer neglect and decay.

Other heritage assets, such as parks, gardens and conservation areas should be given a high level of protection from development that would compromise their role in the landscape or built environment.

Q25 Which heritage assets are the most important to you and why?

The conservation areas, as heritage assets in their own right, define areas where there is a very special need to consider the impact of change on Farnham's character. In landscape terms Farnham Park and Farnham Old Park are important heritage assets of the town. The local plan should ensure that protection for these areas remains as high as possible within the terms of the planning system.

Q26 Do you have any further comments that you would like to raise on this topic?

Not at this time.

Delivering Decent Homes for All

Q27 Do you have any comments on our housing need and how it can be met?

Since the housing need is a product of the government 'standard method' over which WBC has no control there is no option for the local plan other than to take a positive approach to meeting that need. However, even a positive approach allows total site allocations to reflect any genuine 'hard' constraints which place an upper limit on the extent of sustainable development in the borough. WBC should take a location, infrastructure and landscape led approach to assessing the suitability of available sites rather than 'forcing' development into unsustainable locations.

Although duty of cooperation is no longer a requirement, future collaboration with neighbouring authorities, particularly those with which WBC will be joined in due course, should be considered.

Q28 Are you aware of any specific sites not currently allocated in existing Local Plans or otherwise permitted for development that should be considered for their development potential?

Not at this time.

Q29 What role can town and parish councils have in addressing the development needs of the area, such as through preparing neighbourhood plans?

The relationship between neighbourhood plans and the local plan depends firstly on the government's approach to neighbourhood planning. The removal of any external financial support means that smaller communities may no longer be able to produce or update a neighbourhood plan. For those which can, WBC should provide early and clear guidance on the

housing requirement and site size threshold for those parishes which wish to make site allocations within a neighbourhood plan. For those that do not wish to make site allocations, WBC should commit to meaningful and detailed engagement on site allocations and the choice to be made between the sites available to meet housing need. Meaningful dialogue is essential.

Q30 Are there any specific forms of affordable housing that we should aim to prioritise to provide for those most in need locally?

The most pressing need remains rented accommodation which is genuinely affordable i.e. at social rent levels. Farnham Town Council appreciates how difficult this is to achieve but every effort should be made to make it viable to deliver.

Q31 How should we aim to meet the housing needs of current and future residents?

The supply of larger and more expensive homes in and around Farnham reflects the general affluence of the area and historic patterns of development. These areas also contribute significantly to the character of the Farnham area and we would not support policies which were likely to harm the contribution they make. In-fill development or garden subdivision must not be harmful to the character of an area. However, the priority for new development should be smaller 1,2 and 3 bedrooled homes which may be within the affordability range of both younger people and more attractive as a 'down-sizing' option for some older people.

As a centre for education with the University for the Creative Arts located in central Farnham there is a significant requirement for student accommodation and meeting a greater proportion of need through purpose designed schemes that can take pressure off the general housing market and release some rental property back into the general market.

Q32 Do you have any comments on the range of densities that should be sought on new development sites?

New development should blend with the surrounding area, and its density should reflect the character of that area, even if that is lower than would be considered desirable. This would typically be the case in a suburban area or rural village. On larger sites density should vary to create balanced and navigable neighbourhoods.

Regardless of other considerations higher density development will mean a greater number of residents in a given area, and this should be accounted for in planning for infrastructure and access to services, as well as transport options.

Q33 How can we best address the accommodation needs of Gypsy, Traveller, and Travelling Show people communities in a way that respects their culture and way of life?

Allocating to meet gypsy and traveller needs in full should be a high priority because it helps to ensure that robust and decisive action can be taken against unlawful development that may otherwise occur. Well planned and managed sites tend to foster better community relations and assist in the integration of gypsies and travellers with settled residents.

Promoting Sustainable Transport

Q34 What are the key transport issues to be addressed to help new development come forward?

The location of new development relative to existing transport networks and the facilities and services that residents need to reach should be considered fundamental to determining whether it will be genuinely sustainable. Ideally new transport infrastructure should only be needed to enhance and improve existing networks or capacity. The Farnham Optimised Infrastructure Delivery Plan examined transport issues in and around Farnham in considerable detail. This evidence base should inform strategic thinking for the local plan, for instance about the capacity of Farnham to support new development.

WBC Infrastructure Delivery Plan (IDP) must be updated to include the infrastructure required to support growth in Waverley: [Infrastructure Delivery Schedule Update October 2024](#)

In addition, WBC should not avoid considering large scale interventions such as additions to the strategic road network if this is the only way to ensure that high quality new development can be provided at scale.

It is almost impossible to provide development at scale which does not acknowledge that car use is a normal and necessary means of everyday transport. However, development which is not well located will inevitably be entirely car dependent because no other options are available. Whilst car use provides entirely reasonable freedom of choice for those with access to a vehicle, if no other options are available then those who cannot or do not wish to drive have their own freedom constrained.

The availability and cost of public transport should be (realistically) taken into account in decision making. The location of development should reinforce and strengthen the viability of commercial public transport services rather than depending on short term public or private subsidy which will run out or may be withdrawn for financial reasons.

Q35 Is there anything else the Local Plan could do to support and encourage sustainable modes of transport?

Everything possible should be done to ensure that new development is designed and laid out to make walking and cycling a safe and convenient option, for functional and leisure trips and as part of children and young people's play and leisure activities.

The Farnham Local Cycling and Walking Infrastructure Plan and Waverley Local Cycling and Walking Infrastructure Plan both contain detailed proposals to improve physical and service infrastructure and to promote cycling and walking. These should be determinative of choices about the location and design of new development – they should not simply be updated after allocations are made to accommodate them (although that will of course be necessary in due course).

Q36 What are the main transport challenges you face when travelling within or through Waverley? (e.g., congestion, public transport availability, road safety, parking)?

Although all of the problems identified in the question are experienced by many residents, the main issue for the local plan is to better integrate the transport options which are available and to ensure that improvements are also properly coordinated and managed. If we are to make travel safe, convenient and environmentally friendly – whether that is by car, by public transport or on foot/cycle – we need to identify and resolve the points at which it fails to provide some key element of the users requirement. That might be the condition of roads and pavements, the amount of parking at key locations or the availability of public transport to make whole journeys.

Both LCWIPs should be seen as a starting point for strategic decision making.

Q37 Which areas or routes in Waverley do you think experience the most severe transport or traffic problems?

Central Farnham has experienced some of the worst congestion for many years being constrained by its historic built form. It remains a key issue for the town and one which may act as a constraint particularly on development within the town centre.

The level crossing at Farnham station causes severe traffic problems with the length of time the barrier is down to allow for trains both to and from London/Alton and a direct service to Guildford.

If the strategic approach to development includes consideration of larger scale development in the Farnham area then very large infrastructure schemes may need to be considered.

Q38 How effective do you find the current public transport options in Waverley? What improvements would you like to see?

Farnham's bus services around the town and to neighbouring settlements are adequate but more connectivity is required to and from the 'villages'. Any larger scale new development around the town would need to make connections into that existing network – for example to Farnham Station, Farnham Hospital, schools and central Farnham.

Q39 Are there any specific groups (e.g., elderly, disabled, students) whose transport needs are not adequately met?

Within the urban area of Farnham, public transport services provide reasonable accessibility. Our concern is that if peripheral development around Farnham is part of the WBC strategy it will not be well connected and that this will particularly disadvantage non car drivers.

Q40 What are the biggest barriers to walking or cycling for your daily journeys in Waverley? (e.g., lack of safe paths, lighting, distance, weather, facilities)

This will vary from area to area, but within Farnham the greatest problems arise from conflict over shared space or capacity in particular between motorists and pedestrians/cyclists. In addition the quality of maintenance and repair of road and footway surfaces represents a disincentive to cyclists and walkers concerned about safety whilst on the move. The historic built form does not allow for segregation and limited options are available for off road cycle

routes. The Farnham LCWIP will require investment to changes in infrastructure i.e. rail bridge widths, to provide continuous routes.

Q41 Do you have any other ideas or suggestions for improving transport and encouraging active travel in Waverley?

The key issue, as previously mentioned, is to locate new development and new infrastructure where it is readily and easily accessible by a variety of transport modes.

Planning for Economic Growth

Q42 What types of employment premises (e.g. office, industrial, flexible workspaces) do you think are most needed in Waverley to support a diverse and resilient economy?

Farnham currently provides a mixture of employment premises, focussed on professional services, the creative sector and light engineering which reflect both its location and employment base. We would support the retention of a diverse mix of employment space rather than overly concentrating on a single sector. That is important to reflect the evolving nature of employment opportunities post Covid and with an eye to the impact of AI on the professional services sector.

Opportunities for training and reskilling, particularly associated with trades and practical skills will be important in the future and WBC should look to partnership with the education sector to ensure that they can meet this need through new or expanded premises of a suitable nature.

Q43 What sizes of employment space should the Local Plan prioritise (e.g. small units under 3,000 sq. ft., larger industrial units, co-working hubs)?

Within the Farnham town area it will be important to provide easily configurable and flexible small units either to replace 'end of life' existing floorspace or within any significant areas of new development. Co-working hubs and similar shared workspaces should be encouraged in town centres.

There are unlikely to be opportunities for new large industrial or commercial units to be provided within the Farnham town boundary, but they could form part of plans for a new settlement were that option to be pursued.

Q44 What measures should be encouraged or required to ensure new employment premises are environmentally sustainable (e.g. energy efficiency, use of sustainable materials, green roofs, EV infrastructure)?

All new employment premises should be built to high environmental standards, with micro generation and low water net consumption requirements. The extent to which this is a matter for the local plan rather than building regulations is largely a matter for government policy.

Q45 Are there particular areas in the Borough where you feel new or improved employment premises are most needed?

Regenerating and maintaining the extent of employment premises in Farnham is important to maintaining a healthy, mixed community. The University for the Creative Arts is constrained on its site and may require options for off campus facilities.

Q46 Do you have any other suggestions for how the Local Plan can support the delivery of high-quality, sustainable employment premises that meet Waverley’s current and future economic needs?

Not at this time.

Supporting Town and Village Centres

Q47 What do you value most about Waverley’s main town and village centres (e.g. Farnham, Godalming, Haslemere, Cranleigh)?

The nature of town centres is evolving, with traditional convenience retail and services becoming less important (or at least less viable) as part of the town centre offering, whilst destination shopping, cultural, and residential making up a greater part of what makes a town centre successful.

Farnham town centre (like those of the other Waverley towns) lends the town much of its identity. It is vital that it remains relevant to our residents and attractive to visitors by taking advantage of its strengths, in particular its cultural and heritage assets, its historic layout and the presentation of key buildings. Like all town centres it needs to remain ‘visitable’ and interesting, even as the nature of those visits changes over time.

Q48 How should the Local Plan support a mix of uses (e.g. retail, leisure, housing, community services) to keep town centres active and vibrant?

National planning policy (particularly permitted development rights) has reduced the ability of the local planning authority to control some elements of the mix of town centre uses. Where controls are possible, we would support residential use of buildings which clearly have no future for employment or retail purposes, but there should be limits on the extent to which this occurs. A largely residential town centre would lose its fundamental purpose if this excluded other uses. Other uses which provide both a reason to visit the town centre and which meet the needs of residents should however be supported, even if these are not traditionally found in town centre.

It is vitally important that there is a high level of investment in the public realm and infrastructure. This investment is happening through the Farnham Infrastructure Programme, but Farnham town centre is being undermined by the lack of investment in the maintenance and repair of shopfronts.

A Section 215 notice, issued under the Town and Country Planning Act 1990, empowers local planning authorities to compel landowners to improve the condition of land or buildings that adversely affect the amenity of the area.

Q49 Should the Local Plan encourage more housing in or near town and village centres to help support their vitality? If so, what type of housing would be appropriate?

Yes, but to a carefully managed degree so as not to undermine other aspects of the purpose of a town centre. Active shop frontages maintain the character of town centres.

Q50 How can the design and public areas in town centres be improved to make them more attractive and accessible?

As mentioned above, investment in the public realm is one of the most important ways in which local authorities – with their own or private funding – can ensure that their town centres remain a desirable destination. That in turn can stimulate private sector investment and create a ‘virtuous circle’ of improvement.

Seating should be readily accessible.

Again, a Section 215 notice, issued under the Town and Country Planning Act 1990, empowers local planning authorities to compel landowners to improve the condition of land or buildings that adversely affect the amenity of the area.

Q51 Do you have any suggestions for how town centres in Waverley can adapt to future economic and social changes while retaining their character and heritage?

Retaining the character and heritage of Farnham town centre will be a key to its future relevance and function. Farnham Town Council would advocate more flexibility over ‘meanwhile’ and temporary uses (providing they do no harm to the fabric of a property) which may be well suited to some locations. We would also support more events, activities and markets as ways to interest and enthuse visitors, making use of our town centres as a ‘backdrop’, and hopefully creating enough footfall to make more permanent uses viable.

Q52 Do the boundaries for the town centres need to be changed, and if so, how? Cranleigh, Farnham, Godalming, or Haslemere (including Wey Hill)?

The boundaries of Farnham town centre do not need to change.

Q53 How should Waverley’s town and village centres be adapted to meet changing local needs?

Maintaining ‘neighbourhood centres’ in Farnham’s villages and character area is important to ensure residents have access to local facilities.

Q54 What should the Local Plan prioritise to keep our town centres vibrant and active?

- a) Protecting ground floor retail and commercial frontages in primary shopping areas**
- b) Allowing more flexible uses (e.g. cafes, services, community spaces) outside of primary shopping areas**
- c) Encouraging residential uses on upper floors of ground floor town centre uses (e.g. shops)**
- d) Supporting the reuse of vacant units (including for uses other than retail)**
- e) Encouraging a strong evening economy**
- f) Enhancing appearance and public realm (e.g. seating, planting)**
- g) Other (please specify)**

All of the elements listed will need to play a part in ensuring the future vitality of our town centres. What is important is that they are viewed holistically and that planning policy provides the best opportunity to do this. Unless planning decisions can be made with regard to their cumulative contribution it will be difficult to prevent incremental changes.

Farnham prides itself on maintaining a vibrant community and being a destination for visitors.

Q55 Are there particular types of uses (e.g. leisure, health, community, work hubs) that are underprovided within the town centres?

These activities would be well located in town centres and provide a potential use for town centre premises. Any and all of them would contribute to ensuring the relevance and viability of town centre.

Edge of town centres and neighbourhood centres must not be excluded from having these facilities.

Supporting Town and Village Centres

Q56 Do the boundaries of the three existing local centres already identified in the Local Plan Part 2 and Neighbourhood Plans (Farncombe, Milford and Bramley) need to be changed, and if so, how?

No comment.

Q57 Are there any other areas within the borough that should be considered for designation as a local centre?

The Farnham Neighbourhood Plan designates neighbourhood centres in the villages and character area. These are important locally and should be considered in the local plan.

Providing Infrastructure to Support Growth

Q58a What do you think are the infrastructure needs in your local area?

To support growth in and around Farnham it will be essential to identify and make provision for SANGs and ideally for local, off-site, biodiversity net gain.

Farnham Town Council has significant concerns about wastewater treatment capacity to serve the existing level of recent growth in Farnham. Properly planned, funded and programmed upgrading of local wastewater treatment capacity must form part of any further growth proposals.

Access to secondary school education has been and remains a key issue for Farnham and its villages. If significant growth is to be considered sustainable then it is essential that a site is identified within the local plan for a new secondary school, and agreement reached with relevant partners and the promoters of any land to be allocated in its catchment over a funding package and implementation timetable.

Q58b What do you think are the infrastructure needs in the borough as a whole?

This is a question for the local planning authority to consider based on the responses from individual areas and the evidence base.

Q59a Is there sufficient current infrastructure provision, to support new development, in relation to play, sport and recreation facilities (including public open spaces)?

No. SANG capacity acts as a constraint on new development, in particular brownfield development, in and around Farnham. Sport and recreation facilities are inadequate, and new sites need to be found/allocated/developed. WBCs Playing Pitch Strategy falls short in Farnham, and no improvements have been made to existing facilities. Provision would need to be scaled further to meet the demands of new development.

Q59b Is there sufficient current infrastructure provision, to support new development, in relation to health, wellbeing and community facilities?

No. The experience of many of our residents is that access to primary healthcare and dentistry, as well as capacity for elective hospital care is inadequate and presents unreasonable delays. Whilst service numbers and standards are a matter for the ICBs and the NHS, WBC should be prepared to consider the ability of the ICB/NHS to genuinely provide the healthcare required by residents as a constraint on the scale of development in the area.

The need for an increase in secondary school capacity has been addressed in a previous answer.

Q59c Is there sufficient current infrastructure provision, to support new development, in relation to water supply, wastewater and electricity

No. As we have said, existing wastewater treatment capacity in the Farnham area is inadequate and requires 'structural' improvement to provide additional capacity (with a buffer for growth in the future) before additional development is permitted.

It is understood that 'end to end' water studies have been commissioned by WBC but this information is yet to be shared with Farnham Town Council.

Q60 Should the Local Plan safeguard and/or allocate land infrastructure? If so, what types of infrastructure?

Assuming the question relates to 'land for infrastructure' the answer must be yes since this is a fundamental requirement of the local plan process. The nature, extent and location that land will follow from the infrastructure required, for instance land for a secondary school.

Q61 Are there any specific infrastructure issues in your local area that we need to be aware of?

Farnham Town Council has answered this question in previous responses and included the need for infrastructure including highway, pedestrian, cycle, green spaces, sports pitches, public transport, secondary school places, health, wastewater, etc.

Q62 Do you have a view on whether open space and play space in new development should be managed and maintained privately or by the public sector?

Farnham Town Council maintains a number of areas of open space and play areas. Unless public authorities are able to fund the long term cost of maintaining new open space then there is no choice other than that this being done through management companies and service charges to residents.

Q63 What options, including what benchmarks (for example the Fields in Trust standards for green spaces) do you think should be followed for addressing health and wellbeing?

Policy should require that the open space requirement for each new development is assessed on a case by case basis having regard to what already exists in the immediate area, its accessibility and the nature of the development proposed.

Q64 If the Council has to prioritise matters which of the following requirements should be given priority in relation to the delivery of developments

- a. Increase affordable housing contributions from new developments
- b. Emphasise design quality in new developments
- c. Focus on the delivery of new community infrastructure within new developments
- d. Focus on creating exemplary environmental sustainability in new developments
- e. Focus on improving the operation of the transport network

This question recognises that it may be necessary from time to time for WBC to choose between 'cost elements' in a development proposal within the limits of viability. New development will have a permanent effect on the environment, through its character and visual impact as well as carbon and other emissions. The quality of the accommodation provided including access to local services will also have a long term effect on the health and well being of residents. In those cases where choices are necessary, we would advocate that these are the considerations that should be given priority.

Q65 Are there any other priorities not listed above which you feel should be delivery alongside new developments in the Local Plan?

Not at this time.

Q66 How should the Local Plan support climate change adaptation, mitigation and resilience in new developments?

Again, Farnham Town council would like to emphasise that it is the location of new development that will have the greatest impact on its positive or negative effect on climate change and long term resilience. Individual houses or commercial buildings, wherever they are built, can have the same standards of insulation, renewable energy supply and so on. But their lifetime impact will depend on how their occupiers manage their property, travel to meet their needs and make use of local infrastructure. That will vary considerably with location and must be factored into strategic decision making.

Development should not be allowed in areas of flood risk or where it would create the demand for expensive or difficult to achieve flood defence measures.

Q67 How should the Local Plan work towards achieving net zero?

- a) Establishing energy efficiency standards for new buildings**
- b) Allocating sites for renewable energy generation (e.g. solar)**
- c) Encouraging green roofs, green walls and nature based solutions to support nature recovery**
- d) Supporting community-led renewable energy projects**
- e) Encouraging use of sustainable construction materials and methods**
- f) Designing development to reduce overheating**
- g) Encouraging low carbon heating systems**
- h) Encouraging water efficiency**

The extent to which the local plan can establish unique local standards for energy efficiency will depend on the evidence that WBC can provide to justify deviating from national standards. WBC should prioritise testing whether that justification exists. If it does so, Farnham Town Council would support it being included.

All of the other elements mentioned in the question are important and should form part of local plan policy.

Q68 Are there any other priorities not listed above that you feel should be included in the Local Plan? Please specify.

The local plan should ensure, in line with national policy, that development does not take place in areas at current or future flood risk.

Q69 What are your views on the Local Plan requiring higher standards of energy efficiency than required by the new Future Homes Standard?

WBC will only be permitted to set higher energy standards than the Future Homes Standard if there is evidence that this is locally justified and will not have an adverse impact on viability.

Q70 Should the Local Plan allocate sites for renewable energy projects?

Yes. Given government policy, particularly for the growth in large scale solar capacity this is not a matter which the local plan can avoid.